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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No.: 2:22-cr-00137-JAM
Plaintiff,)	STIPULATION REGARDING
)	EXCLUDABLE TIME PERIODS
vs.)	UNDER SPEEDY TRIAL ACT;
MYRA BOLECHE MINKS AND)	ORDER
JESSICA TANG,)	Date: January 9, 2024
Defendants)	Time: 9:00 a.m.
)	Judge: Hon. John A. Mendez

STIPULATION

1. By previous order, this matter was set for status on January 9, 2024.
2. By this stipulation, the defendants now move to **CONTINUE** the status conference until **April 23, 2024, at 09:00 a.m.**, and to exclude time between January 9, 2024, and April 23, 2024, under Local Codes T2 and T4.
3. On November 15, 2023, the court allowed then counsel for Myra Minks to withdraw from the case as counsel for defendant Minks. The court then appointed Todd Leras to be counsel for Myra Minks. At that time, Mr. Leras represented to the court that he was to begin a multi-month federal trial in the Eastern District of California in February of 2024.
4. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with

1 this case includes approximately 3,500 pages of reports, video and audio
2 recordings, and photographs. In addition, digital device extractions have been
3 produced in discovery and amount to approximately 10 TB of data. All of this
4 discovery has been produced directly to counsel.

5 b) Counsel for the defendants desire additional time to review the discovery,
6 counsel with their clients, conduct investigation and research related to the
7 criminal charges, and otherwise prepare for trial.

8 c) Counsel for the defendants believe that failure to grant the above-requested
9 continuance would deny them the reasonable time necessary for effective
10 preparation, taking into account the exercise of due diligence.

11 d) The government does not object to the continuance.

12 e) Based on the above-stated findings, the ends of justice served by continuing
13 the case as requested outweigh the interest of the public and the defendant in a
14 trial within the original date prescribed by the Speedy Trial Act.

15 f) For the purpose of computing time under the Speedy Trial Act, 18
16 U.S.C. § 3161, et seq., within which trial must commence, the time period of
17 January 9, 2024 to April 23, 2024, inclusive, is deemed excludable pursuant to
18 18 U.S.C. § 3161(h)(7)(A), B(ii), (iv) [Local Code T2 and T4] because this is a
19 complex case and it results from a continuance granted by the Court at
20 defendant's request on the basis of the Court's finding that the ends of justice
21 served by taking such action outweigh the best interest of the public and the
22 defendant in a speedy trial.

23 5. Nothing in this stipulation and order shall preclude a finding that other provisions
24 of the Speedy Trial Act dictate that additional time periods are excludable from
25 the period within which a trial must commence.

26
27 **IT IS SO STIPULATED.**
28

1 DATED: January 4, 2024

PHILLIP A. TALBERT
United States Attorney

2
3 /s/ JUSTIN L. LEE

JUSTIN L. LEE

4 Assistant U.S. Attorney

5 DATE: January 4, 2024

6 /s/ TODD LERAS

TODD LERAS

7 Attorney for Myra Minks

8
9 DATE: January 4, 2024

10 /s/ Thomas A. Johnson

THOMAS A. JOHNSON

11 Attorney for Jessica Tang

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17 **ORDER**

18 IT IS SO FOUND AND ORDERED.

19
20 Dated: January 04, 2024

/s/ John A. Mendez

21 THE HONORABLE JOHN A. MENDEZ

22 SENIOR UNITED STATES DISTRICT JUDGE